

EXHIBIT B

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

DILLARD ROSS,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO: STCV21-00013
)	
SYNERGY MARINE PTE LTD,)	
ARGOSY PTE LTD., and SYNERGY)	
MARITIME PVT LTD,)	
)	
Defendants.)	

ACKNOWLEDGMENT OF SERVICE
AND WAIVER OF SUMMONS

NOW COME **SYNERGY MARINE PTE LTD, ARGOSY PTE LTD, and SYNERGY MARITIME PVT LTD**, through their attorneys of record, and as of the date affixed below, hereby acknowledge due and legal service of Plaintiff's Complaint, Interrogatories and Request for Production of Documents to Defendants, and waive service of summons in this action while expressly reserving any and all rights and defenses, including but not limited to the right to contest jurisdiction and venue in this Court and to remove this action to the federal court.

This 16th day of February, 2021.

HUNTER, MACLEAN, EXLEY & DUNN, P.C.

/s/ Colin A. McRae
Colin A. McRae
Georgia Bar No. 499045
Attorneys for Defendants

Post Office Box 98408
Savannah, GA 31412-0048
(912) 236-0261

CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the above and foregoing document by causing same to be ____ placed in the United States mail, postage prepaid, ____ hand delivered, and/or ____ sent via email to the following:

Brent J. Savage, Esquire
SAVAGE TURNER DURHAM
PINCKNEY & SAVAGE
102 East Liberty Street, 8th Floor (31401)
Post Office Box 10600
Savannah, GA 31412

This 16th day of February, 2021.

/s/ Colin A. McRae
Colin A. McRae
Georgia Bar No. 499045
Attorneys for Defendants

HUNTER, MACLEAN, EXLEY & DUNN, P.C.
Post Office Box 98408
Savannah, GA 31412-0048
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General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of CHATHAM County

For Clerk Use Only

Date Filed 1/4/2021

MM-DD-YYYY

Case Number STCV21-00013

Plaintiff(s)

ROSS, DILLARD

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney BRENT J. SAVAGE

Defendant(s)

SYNERGY MARINE PTE LTD

Last First Middle I. Suffix Prefix

ARGOSY PTE LTD

Last First Middle I. Suffix Prefix

SYNERGY MARITIME PVT LTD

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Bar Number 627450 Self-Represented ☐

Check One Case Type in One Box

General Civil Cases

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contract
☐ Garnishment
☐ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☒ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Dissolution/Divorce/Separate Maintenance
☐ Family Violence Petition
☐ Paternity/Legitimation
☐ Support - IV-D
☐ Support - Private (non-IV-D)
☐ Other Domestic Relations

Post-Judgment - Check One Case Type

- ☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Modification
☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. _____
Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.



In The State Court of Chatham County

133 Montgomery Street, Room 501, Savannah, GA 31401

www.statecourt.org • Phone (912) 652-7224 • FAX (912) 652-7229 • clerk@statecourt.org

DILLARD ROSS

STCV21-00013

Plaintiff

Case Number

Vs

SYNERGY MARINE PTE LTD,
ARGOSY PTE LTD AND
SYNERGY MARITIME PVT LTD

Address of Defendant

SYNERGY MARINE PTE LTD
1 KIM SENG PROMENADE
#10-11/12 GREAT WORLD CITY WEST
TOWER
REPUBLIC OF SINGAPORE 237994

Defendant

SUMMONS

TO THE ABOVE NAMED DEFENDANT: SYNERGY MARINE PTE LTD

Defendant's Address 1 Kim Seng Promenade, #10-11/12 GREAT WORLD CITY WEST TOWER, SINGAPORE

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

BRENT J. SAVAGE
SAVAGE TURNER DURHAM PINCKNEY & SAVAGE
POST OFFICE BOX 10600
SAVANNAH, GA 31412

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

Brian K. Hart
CLERK OF COURT
State Court of Chatham County

/s/ Moneisha Green

Deputy Clerk, State Court of Chatham County

Not valid until
signed and sealed
by a Deputy Court
Clerk

PRINT

27. Summons 10-16-2020



In The State Court of Chatham County

133 Montgomery Street, Room 501, Savannah, GA 31401

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DILLARD ROSS

STCV21-00013

Plaintiff

Case Number

Vs

SYNERGY MARINE PTE LTD,
ARGOSY PTE LTD AND
SYNERGY MARITIME PVT LTD

Address of Defendant

ARGOSY PTE LTD
35-01, OUE DOWNTOWN
5 SHENTON WAY
REPUBLIC OF SINGAPORE 068809

Defendant

SUMMONS

TO THE ABOVE NAMED DEFENDANT: ARGOSY PTE LTD

Defendant's Address 35-01, OUE DOWNTOWN, 5 SHENTON WAY, REPUBLIC OF SINGAPORE 068809

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney,
whose name and address is:

BRENT J. SAVAGE
SAVAGE TURNER DURHAM PINCKNEY & SAVAGE
POST OFFICE BOX 10600
SAVANNAH, GA 31412

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

Brian K. Hart
CLERK OF COURT
State Court of Chatham County

/s/ Moneisha Green

Deputy Clerk, State Court of Chatham County

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27. Summons 10-16-2020



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DILLARD ROSS

STCV21-00013

Plaintiff

Case Number

Vs

**SYNERGY MARINE PTE LTD,
ARGOSY PTE LTD AND
SYNERGY MARITIME PVT LTD**

Address of Defendant

SYNERGY MARITIME PVT LTD
4TH FL, AKDR TOWER
3/381, RAJIV GANDHI SALAI (OMR)
METTUKUPPAM, CHENNAI
600097, INDIA

Defendant

SUMMONS

TO THE ABOVE NAMED DEFENDANT: SYNERGY MARITIME PVT LTD

Defendant's Address 4TH FL, AKDR TOWER 3/381, RAJIV GANDHI SALAI (OMR) METTUKUPPAM, CHENNAI

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

**BRENT J. SAVAGE
SAVAGE TURNER DURHAM PINCKNEY & SAVAGE
POST OFFICE BOX 10600
SAVANNAH, GA 31412**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

Brian K. Hart

CLERK OF COURT

State Court of Chatham County

/s/ Moneisha Green

Deputy Clerk, State Court of Chatham County

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by a Deputy Court
Clerk

PRINT

27. Summons 10-16-2020



In The State Court of Chatham County, Georgia

133 MONTGOMERY STREET, ROOM 501, SAVANNAH, GA 31401

www.statecourt.org • Phone (912) 652-7224 • FAX (912) 652-7229 • clerk@statecourt.org

DILLARD ROSS

Counsel or Party Counsel or Party
STCV21-00013

Plaintiff

Case Number

Vs

SYNERGY MARINE PTE LTD,

ARGOSY PTE LTD

AND SYNERGY MARITIME PVT LTD

Defendant

CERTIFICATION UNDER RULE 3.2

Pursuant to rules 3.2 and 3.4 of the Uniform Superior Court Rules and Local Rule # 3.2 of the Eastern Judicial Circuit of Georgia, I hereby certify that no case has heretofore been filed in the State Court of the Eastern Judicial Circuit involving substantially the same parties or substantially the same subject matter or substantially the same factual issues which would require the petition-pleading to be specifically assigned to the judge whom the original action was or is assigned.

This _____ day of JANUARY, 20 21

Counsel or Party

OR

Pursuant to Rules 3.2 and 3.4 of the Uniform Superior Court Rules and Local Rule # _____ of the Eastern Judicial Circuit of Georgia, I hereby certify that this petition-pleading involves substantially the same parties or substantially the same factual issues as in Case # _____

VS

Plaintiff

Defendant

Filed in The Eastern Judicial Circuit of Georgia which under Rule 3.2 of the Superior Court rules require the petition-pleading, be specifically assigned to the Judge whom the original action was or is assigned.

Counsel or Party

PRINT

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

DILLARD ROSS,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO: STCV21-00013
)	
SYNERGY MARINE PTE LTD,)	
ARGOSY PTE LTD., and SYNERGY)	
MARITIME PVT LTD,)	
)	
Defendants.)	

COMPLAINT FOR DAMAGES

COMES NOW, DILLARD ROSS, Plaintiff in the above-styled action, and brings this Complaint for Damages against the above-named Defendants, respectfully showing this Court as follows:

I. PARTIES, JURISDICTION AND VENUE

1. Plaintiff is a resident of Chatham County, Georgia.
2. Defendant SYNERGY MARINE PTE LTD is a foreign maritime entity with its principal office and place of business located at 1 Kim Seng Promenade, #10-11/12 Great World City West Tower, Republic of Singapore, 237994. Defendant SYNERGY MARINE PTE LTD will be served with process in compliance with the requisite international treaties and other legal obligations.
3. At all times relevant to this cause of action, Defendant SYNERGY MARINE PTE LTD was doing business in the State of Georgia within Chatham County.

4. Defendant ARGOSY PTE LTD is a foreign maritime entity with its principal office and place of business located at 35-01, OUE Downtown, 5, Shenton Way Republic of Singapore 068809. Defendant ARGOSY PTE LTD will be served with process in compliance with the requisite international treaties and other legal obligations.

5. At all times relevant to this cause of action, Defendant ARGOSY PTE LTD was doing business in the State of Georgia within Chatham County.

6. Defendant SYNERGY MARITIME PVT LTD is a foreign maritime entity with its principal office and place of business located at 4th Floor, AKDR Tower, 3/381, Rajiv Gandhi Salai (OMR), Mettukuppam, Chennai - 600097, India. Defendant SYNERGY MARITIME PVT LTD will be served with process in compliance with the requisite international treaties and other legal obligations.

7. At all times relevant to this cause of action, Defendant SYNERGY MARITIME PVT LTD was doing business in the State of Georgia within Chatham County.

8. Upon information and belief, Defendants own, manage, operate, direct, and crew vessels, including the *M/V Maersk Salto*, to call upon and transact business in the Port of Savannah, Chatham County, Georgia, on a routine, regular, and systematic basis.

9. This cause of action is based upon injuries sustained by Plaintiff on the navigable waters of the United States, more specifically, in Chatham County, Georgia.

10. Plaintiff brings this cause of action under the Savings to Suitors clause of 28 USC § 1333, general maritime law, Georgia law, and all laws supplementary and amendatory thereto.

11. Jurisdiction and venue are proper in this Honorable Court.

II. FACTUAL ALLEGATIONS

12. On or about December 8, 2020, Plaintiff was working as a longshoreman aboard the vessel *M/V MAERSK SALTORO* at Container Berth 8 of the Garden City Terminal of the Georgia Ports Authority.

13. In the course of his employment duties on said date and place, Plaintiff was directed to perform certain duties on the vessel *M/V MAERSK SALTORO*, and Plaintiff was lawfully on the vessel at all times mentioned herein.

14. Upon information and belief, Defendants own, manage, operate, direct, and crew vessels, including the *M/V MAERSK SALTORO*, to call upon and transact business in the Port of Savannah, Chatham County, Georgia, on a routine, regular, and systematic basis.

15. At all times herein mentioned, the *M/V MAERSK SALTORO* was located on the navigable waters of the United States and within the State of Georgia for the purpose of loading and discharge of cargo.

16. While in the process of performing his duties on the *M/V MAERSK SALTORO*, Plaintiff was walking down the steep gangway, holding onto the left hand rail, to exit from onboard the vessel. When Plaintiff reached the lower part of the gangway, the left hand rail suddenly and without warning collapsed and gave way, causing him to grab onto the right handrail and fall forward approximately four to five

feet. As a result of Plaintiff's fall on the gangway due to the left hand rail collapsing, he sustained a serious injury to his right shoulder and lumbar spine.

III. CAUSES OF ACTION

A. Negligence

17. Defendants had substantial control, oversight and knowledge of the equipment on board of the *M/V MAERSK SALTORO*, and breached their duty to Plaintiff and other longshoreman by failing to exercise reasonable care to properly operate and maintain the equipment and ensure that the workers aboard the vessel were provided with equipment fit for the equipment's intended use.

18. Defendants knew or should have known there was an unsafe risk that a damaged or improperly secured gangway could result in substantial injuries to those working aboard the vessel.

19. Upon information and belief, Defendants were in charge of, responsible for, and/or had control over the gangway and breached their duties to Plaintiff by failing to properly operate and maintain this equipment and by failing to ensure the equipment was reasonably fit for its intended use.

20. Plaintiff's injuries were not the result of any fault or negligence on the part of the Plaintiff, but were proximately caused by the negligence of Defendants, its agents, servants or employees, acting in the following respects:

- a. Negligent failure to operate, maintain, inspect, and replace damaged or defective vessel equipment;

- b. Employment of incompetent officers, crew, and/or maintenance personnel responsible for operating, maintaining, inspecting and replacing damaged or defective vessel equipment;
- c. Negligent failure to properly train officers, crew in the acts of operating, maintaining, inspecting and replacing damaged or defective vessel equipment;
- d. Negligent failure to operate and maintain the vessel and/or the gangway at issue in a reasonably safe condition and failure to provide Plaintiff with a reasonably safe place to work;
- e. Negligent failure to warn Plaintiff of the defective condition of the *M/V MAERSK SALTORO* and its appurtenances and vessel equipment;
- f. Other acts of negligence which will appear more fully at the trial of this matter.

21. Defendants' above-described negligent acts and omissions constitute a proximate cause of the injuries sustained by Plaintiff.

IV. INJURIES AND DAMAGES

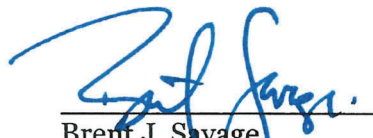
22. Plaintiff brings this action against the Defendants to recover medical expenses, past, present, and future; lost wages, past, present, and future; pain and suffering, both physical and emotional, past, present, and future; and permanent impairment.

23. Defendants have acted in bad faith, been stubbornly litigious, and/or caused Plaintiff unnecessary trouble and expense, such actions entitling Plaintiff to recover attorneys' fees and expenses pursuant to O.C.G.A. § 13-6-11.

WHEREFORE, Plaintiff prays for the following relief:

- (A) That summons and process issue and be served upon Defendants;
- (B) For a trial by a jury comprised of twelve persons;
- (C) That Plaintiff be awarded an appropriate sum to compensate him for his injuries and damages;
- (D) That Plaintiff be awarded reasonable attorneys' fees and litigation expenses; and
- (E) For such other and further relief as the Court deems just and proper.

This 4th day of January 2021.



Brent J. Savage
Georgia Bar No. 627450

SAVAGE, TURNER, DURHAM
PINCKNEY & SAVAGE
Post Office Box 10600
Savannah, GA 31412
(912) 231-1140

supplemental answers if you or your attorneys obtain further information between the time answers are served and the time of trial. Any such supplemental answers are to be filed and served upon counsel for the Plaintiff within thirty (30) days from receipt of such additional information but not later than ten (10) days prior to the time of trial.

NOTE D: "Document" means: (1) every writing or record of every type and description that is or has been in your possession, control, or custody or of which you have knowledge, including but not limited to, correspondence, inter-office memoranda, tapes, email, computer files, hard disks, databases, backup tapes, stenographic or hand-written notes, studies, publications, books, pamphlets, pictures (drawings and photographs), films, microfilms, voice recordings, maps, reports, surveys, minutes, statistical computations, invoices, production orders, sales records, and any other writing evidencing or reflecting facts relevant to the Plaintiff's claims; (2) every copy of the above-described writing record where the original is not in your possession, custody or control; (3) every copy of each such writing or record where such a copy is not an identical copy of the original by virtue of any commentary or notation that does not appear on the original.

NOTE E: Throughout these interrogatories, where Defendant is requested to identify a person, the following information should be furnished:

- (a) The person's full name;
- (b) His or her present home and business address and telephone number at each address;
- (c) His or her occupation; and
- (d) His or her place of employment.

NOTE F: As used herein, terms in the singular include the plural and terms in the plural include the singular.

1. Please state the name, address, telephone number, brief summary of the knowledge said person has/claims to have and employer/job title at the time of Plaintiff's injury of each and every person who has or claims to have knowledge or information (including medical information) regarding any facts, circumstances, or issues involved in Plaintiff's Complaint.
2. Please state the name, address and telephone number of those persons whose formal or informal statements, verbal or written, were obtained by you or any of your representatives in connection with the incident in question or any issue in this lawsuit. State the date of each statement, state where it was obtained, and identify by name, address and telephone number the person obtaining it.
3. Do you have in your possession or do you have access to a written or recorded statement or summary of notes of an oral statement by the Plaintiff? If so, please state the date of each statement, where it was obtained, and identify by name, address and telephone number the person obtaining it.
4. Please state the name, address, telephone number, employer, and job title of any person or persons who made any investigations or reports as a result of or in connection with the incident giving rise to this lawsuit, and identify by title each report or other document resulting from same.
5. Do you have, or does your attorney or other representative have any

photographs, videotapes, sketches, diagrams, blueprints, plans, etc., taken or made in connection with the Plaintiff's injury or the matters and things involved in Plaintiff's claim or this lawsuit?

6. Please state the name, address, telephone number, opinions held, list of documents upon which they rely, list of all records provided and field of expertise of any person you will call at trial as an expert witness.
7. Please state who lowered the gangway, the time it was done and inspections made of it. Also, please state any discussions repeatedly had with any stevedore or ILA member about the gangway.
8. Were any corrective actions taken in response to Dillard Ross's injuries? If so, what were they?
9. At the time of the Plaintiff's injury as described in the Complaint, please provide the name and address of each insurer, the policy number and limits of liability for each type of coverage and the nature of any exclusions for any policies (primary or excess) of insurance insuring your liability for the type of risk sued on herein.
10. Please state the wording of any safety or operating rules, regulations or recommendations, whether written or verbal, pertaining to Plaintiff's work activity (going down a gangway) at the time of the injury described in the Complaint.
11. Were any written reports made of any inspections of the gangway that is alleged to have injured the Plaintiff prior to or subsequent to Plaintiff's injury?

12. If any written or oral reports were made of any such inspections referred to in the preceding interrogatory, please state the date of such report, and from whom and to whom said reports were made last preceding and first following Plaintiff's injury.
13. Please state the name, address and job classification of all such persons who gave notice or made complaints about the subject gangway prior to the time of Plaintiff's injury and state whether said notice or complaint was put in writing and, if so, the present location of said written document.
14. Are you in possession of photographs or videotapes in which the Plaintiff appears or of the site of Plaintiff's injury either before or after it occurred?
If so, please state:
 - (a) How many photographs or videotapes were made and when and where they were made?
 - (b) The name and present address of by whom they were made and the name and address of the person who presently has possession of them;
15. Who is responsible for maintaining and operating the subject gangway?
16. The name, business and home addresses of the officers, directors and shareholders of the Defendant.
17. State which documents Defendant possesses, maintains or has access to which state the specifications for the inspection, maintenance and replacement of the subject vessel's gangway.
18. How do you contend the gangway railing collapsed?

19. Who was responsible for placing/securing the netting in the area where Dillard Ross fell?
20. Who was responsible for the placement of the gangway at the time Dillard Ross fell?
20. Do you contend Dillard Ross was contributorily negligent in any way?
22. Do you contend any third party not named in this lawsuit was contributorily negligent? If so, how?

This 4 day of January, 2021.



Brent J. Savage
Georgia Bar No. 627450

SAVAGE, TURNER, DURHAM
PINCKNEY & SAVAGE
Post Office Box 10600
Savannah, GA 31412
(912) 231-1140

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

DILLARD ROSS,)	
)	
Plaintiff,)	
)	STCV21-00013
v.)	CIVIL ACTION NO: _____
)	
SYNERGY MARINE PTE LTD,)	
ARGOSY PTE LTD., and SYNERGY)	
MARITIME PVT LTD,)	
)	
Defendants.)	

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS TO DEFENDANTS**

COMES NOW, Plaintiff in the above-styled case, and requires Defendant Georgia Ports Authority, pursuant to O.C.G.A. §9-11-34 to produce for inspection and copying at the offices of the Plaintiff's attorney of record, Brent J. Savage, at Savage, Turner, Pinckney & Savage, 102 East Liberty Street, Eighth Floor, Savannah, Georgia 31401, the following documents within forty-five (45) days of the date of service of this request.

Plaintiff requests that, along with the production of documents, a written response be made detailing the documents produced and any documents covered by these requests which the Defendants objects to producing.

NOTE A: These requests are continuous and should be supplemented if additional information is received at a later date.

NOTE B: If documents requested are not in the Defendants' possession,

please state as follows:

- (1) name of person who has possession or knowledge of whereabouts;
- (2) business address of such;
- (3) business telephone number of such.

NOTE C: If you claim that a privilege applies to any document sought by this request, then state the factual and legal basis for the claimed privilege and identify the document (by date, author, recipient, general subject matter) so that it can be described in a motion to compel.

1. Any and all accident records, reports, memoranda and emails relating to the Plaintiff in Defendant's possession.
2. The entire crew list of the *M/V MAERSK SALTORO* and the employee list of the *M/V MAERSK SALTORO* for the voyage and activity at issue herein, including addresses and telephone numbers.
3. Any and all log books (or other records) kept by the *M/V MAERSK SALTORO* for the aforesaid voyage, or by Defendant for the involved activity, including where applicable, but not limited to, the following:
 - (a) Deck logs;
 - (b) Engineer's logs;
 - (c) Medical logs;
 - (d) Radio logs;
 - (e) Repair and maintenance logs; and
 - (f) Electrical work logs.
4. Any and all statements, including of the Plaintiff, either oral or written,

signed or unsigned, and/or any and all recordings, by whatever means, relating to the incident complained of herein.

5. All photographs, videotapes, records, and any other depiction or written descriptions taken by the Defendant or its representatives, involving, concerning, regarding or in any way connected with the matters at issue herein, including specifically any of Plaintiff.

6. Any and all reports, notes, memoranda, correspondence, emails and related data made or kept by the Defendant, its agents, and/or employees, for or on behalf of or in the interest of the Defendant, and kept in its regular course of business, currently in existence or in its custody, possession and control, pertaining to Plaintiff's injury and claim against Defendant herein.

7. All communications transmitted or received in connection with Plaintiff's injuries.

8. All U.S. Coast Guard, Occupational Safety and Health Administration, or other reports or accident reports filed in connection with Plaintiff's injury.

9. All medical and other types of bills paid by Defendant for medical treatment or services for Plaintiff or otherwise paid on Plaintiff's behalf.

10. All expert's reports, test results, data relied on, and other information upon which said expert has relied or utilized to formulate his opinion, irrespective of whether said expert will or will not be called to testify or whether his or her opinion is not yet finalized.

11. Copies of all policies of insurance (whether primary or excess) pertaining to the claims made in this lawsuit.

12. All safety and/or operating rules, pamphlets, books, newsletters, posted notices, and other such safety or operating rules or regulations in effect at the time of the incident that forms the basis of this litigation.

13. All contracts existing between the Defendants and between any other company or entity concerning the activities, vessel, crew members, etc., pertaining to the work activities undertaken on the date of Plaintiff's injury.

14. Copies of any diagrams, sketches, drawings, blueprints, etc., of the area of the *M/V MAERSK SALTORO* where Plaintiff's injury occurred.

15. All maintenance and repair records, if any, relating to the equipment and/or area of the *M/V MAERSK SALTORO* where Plaintiff's injury occurred, whether made before or after Plaintiff left the vessel.

16. All written reports of routine or special inspections made of the equipment and/or area of the *M/V MAERSK SALTORO* where Plaintiff's injury occurred, whether made before or after Plaintiff left the vessel.

This 4th day of January, 2021.



Brent J. Savage
Georgia Bar No. 627450

SAVAGE, TURNER, DURHAM
PINCKNEY & SAVAGE
Post Office Box 10600
Savannah, GA 31412
(912) 231-1140